WestPoint Stevens, Inc.	**)**	**Departmental**
York County	**)**	**Findings of Fact and Order**
Biddeford, Maine	**)**	**Air Emission License**
A-79-71-L-A/R	**)**	

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

WestPoint Stevens, Inc. (WPS) of Biddeford, Maine, has applied to renew their Air Emission License permitting the operation of various equipment and processes at their textile manufacturing facility.

Four gas-fired cloth dryers (Dryers #1 - #4) were previously not included in the air emission license for WPS. The dryers have been included in this license. The four emission units referred to as Dryers #1 - #4 in the previous license have been renamed "Drying Ranges #1 - #4," to more accurately reflect their use, and the construction dates for the Air Makeup Ranges #1 - #4 have been corrected to represent the equipment located at WPS.

Boiler #1 is equipped with low-NOx burners, which has been noted in this license.

B. Emission Equipment

WPS is authorized to operate the following equipment:

Fuel Burning Equipment

Equipment	**Max. Cap. (MMBtu/hr)**	**Fuel Type**	**Manuf. Date**	**Max. Firing Rt. (scf/hr)**	**Control Device**	**Stack #**
Boiler #1*	110	Nat. gas	1937	1,100,000	Low NOx burners	1
Drying Range #1	8.8	Nat. gas	1967	8,544	Fume Eliminator	3
Drying Range #2	11.6	Nat. gas	1970	11,262	Fume Eliminator	4
Drying Range #3	6.0	Nat. gas	1981	5,825	Fume Eliminator	5

Drying Range #4	8.8	Nat. gas	1997	8,544	Fume Eliminator	8
Air Makeup R1	4.2	Nat. gas	1996	4,078	None	N/A
Air Makeup R2	4.2	Nat. gas	1996	4,078	None	N/A
Air Makeup R3	4.2	Nat. gas	1996	4,078	None	N/A
Air Makeup R4	4.2	Nat. gas	1997	4,078	None	N/A
Dryer #1	2.9	Nat. gas	--	2,816	Lint screen	N/A
Dryer #2	2.9	Nat. gas	--	2,816	Lint screen	N/A
Dryer #3	2.9	Nat. gas	--	2,816	Lint screen	N/A
Dryer #4	2.9	Nat. gas	--	2,816	Lint screen	N/A

*Boiler #1 was manufactured with a maximum design capacity of 150 MMBtu/hr, firing fuel oil. It has been retrofit to limit its capacity to 110 MMBtu/hr, firing natural gas.

WPS also operates three gas-fired direct flame laminators rated at 400,000 Btu/hr each. Particulate emissions from the flame laminators are controlled by individual CVM Pulse Jet Baghouses. The flame laminators each have heat inputs less than 0.5 MMBtu/hr; therefore they are considered insignificant and are included on this license for inventory purposes only.

C. Application Classification

The modification of a minor source is considered a major modification based on whether or not expected emission increases exceed the "Significant Emission Levels" as given in Maine's Air Regulations. This modification is determined to be a minor modification and has been processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Department regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas. BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Chapter 100 of the Air Regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

Process Description
WPS manufactures Vellux blankets. Vellux is a flocked, non-woven textile product that was developed at and is a registered trademark of, WPS. The blankets manufactured at this facility are shipped to various retail stores where they are sold to the public. The manufacturing process is illustrated in Figure 1.

The blankets start as polyester scrim sandwiched between two layers of foam. This substrate serves as the base or core of the blankets. Layers of foam with a scrim layer between them meet at a pair of nip rolls. A natural gas flame melts the layers of foam and scrim enough to bond them together. The bonded substrate is trimmed to the desired width and calendered onto a roll. Emissions from the flame laminators are conveyed to a conventional pulse-jet baghouse for control. A photohelic instrument measures the pressure drop across the bags and controls the speed of the electric blower through a variable speed drive to maintain the desired negative pressure at the exhaust hood. The specially manufactured bags are coated with lime prior to startup, and they are cleaned with the pulse-jet air system during machine shutdown or more often as needed. Approximately 10 lbs. of residue is collected from the baghouse each 8 hour shift.

Elsewhere in the manufacturing facility, flock is prepared. The flock will be attached to the blanket substrate and form the fuzzy Vellux finish. Nylon tow is fed through cutters to be chopped to the required length. The sheared flock is transferred to a finish tank containing additives where it is heated with steam. When the batch reaches the desired temperature, it is fed into a centrifuge, and then conveyed by blower to a drying system. The dried flock is collected in hoppers and bagged for use in the flocking module described below.

A conventional design pulse-jet baghouse control device captures the fines from the tops of the cyclones. A photohelic instrument measures the pressure drop across the bags and activates the pulse-jet cleaning system to shake the fines from the bags. The fines drop into a hopper below.

In the next operation, adhesive is applied to the blanket substrate using a print roll machine. A mixture containing the base adhesive, pigments, and necessary additives is pumped to the print roll machine from batch tanks. After adhesive is applied to the substrate, the substrate enters a flocking module from which the flock falls continuously. The flock becomes embedded in the adhesive by gravity and vibration and excess flock is removed by vacuum. Once flocking is complete, the flocked substrate passes initially through a natural gas fired flat oven to dry and subsequently through a natural gas fired loop dryer to cure the adhesive. The flocked substrate is brushed and vacuumed to remove contaminants. The oven area is supplied with makeup air from natural gas-fired air make up units in order to replenish the air drawn into the dryers. The control

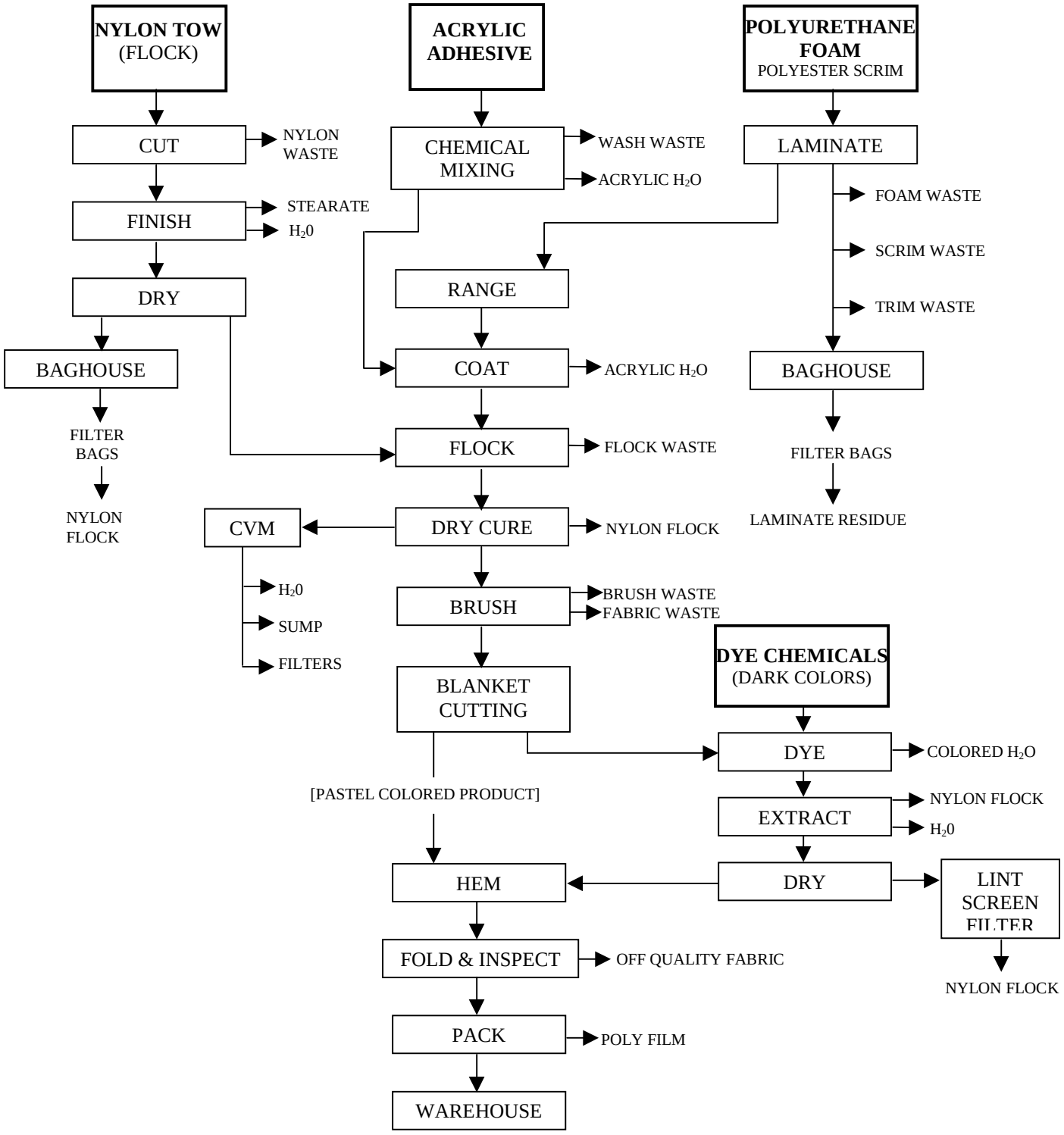
device for the drying/curing operation is a combination of a wet scrubber followed by a bank of packed fiberglass filters serving as a fume eliminator for opacity control. The exhaust blower on the fume eliminator creates a small negative pressure on the flat oven and loop dryer. The control device is interlocked with the flat oven and loop dryer so that the natural gas flow to the dryers is stopped if the control device fails.

After flocking is complete, the Vellux material is then cut to blanket length, and dark-colored blankets are dyed in dyeing machines. The dye machines are filled with water and heated before addition of the dye solution, and the Vellux material is heated further in the dye liquor to fix the dye. After rinsing, the Vellux blankets are dried before being transported to the sewing department for finishing, labeling and packaging. Emissions from the Dryers are controlled through the use of circular, bronze, 80-mesh lint screens placed in the dryer exhaust. The screens are automatically cleaned after each drying cycle.

After the blankets are dyed and inspected, they proceed to the packaging room where they are cut, hemmed, folded and packaged. Boxes of blankets are warehoused for shipment to customers.

B. WPS also operates one natural gas-fired boiler originally rated at 150 MMBtu/hr but de-rated to 110 MMBtu/hr. The boiler is used for building heat and various processes and has low-NOx burners.

C. Boiler #1
Boiler #1 was manufactured in 1937 firing fuel oil with a maximum heat input of 150 MMBtu/hr and retrofit to fire natural gas with a maximum heat input capacity of 110 MMBtu/hr in 1991. The fixed capital cost for the reconstruction did not exceed 50 percent of the fixed capital cost required to construct a comparable new boiler, therefore Boiler #1 is not subject to EPA New Source Performance Standards (NSPS) Subpart Db for boilers with heat inputs of 100 MMBtu/hr or greater and manufactured or reconstructed after June 19, 1984. Boiler #1 operates with Low-NOx burners.



NOTE: Items shown outside of a box are waste by-products

Figure 1: Vellux Manufacturing Flow Chart

BPT for Boiler #1 is the following:

1. The firing of natural gas.
2. PM emission limits are regulated by MEDEP Chapter 103 for fossil-fuel fired boilers greater than 3 MMBtu/hr, but are superceded by the more stringent BPT limit. PM_{10} limits are derived from the PM calculations.
3. Operation of Low-NOx burners for control of NOx.
4. NOx emission limits are based upon AP-42 data dated 7/98 for boilers with low-NOx burners and firing natural gas.
5. SO_2, CO and VOC emission limits are based upon AP-42 data dated 7/98 for natural gas fired boilers.
6. Visible emissions from boiler #1 (stack 1) shall not exceed 10% opacity on a 6-minute block average, except for no more than 2 six-minute block averages in a 3-hour period.

D. Drying Ranges, Air Makeup Units and Dryers

Drying Ranges #1 - #4 were manufactured in 1967, 1970, 1981 and 1997, respectively, firing natural gas with a capacity of 8.8, 11.6, 6.0 and 8.8 MMBtu/hr. Emissions from the Drying Ranges are controlled with fume eliminators that consist of a recirculating wet scrubber/spray condenser followed by a fabric filter. The fume eliminators condense and remove semi-volatiles, PM and PM_{10} in the exhaust.

Each drying range has an associated makeup air heating unit designated R1 – R4. Makeup Air Units R1 – R3 were constructed in 1996, and R4 was constructed in 1997. Each fires natural gas with a heat input of 4.2 MMBtu/hr. R4, which has not previously been licensed, differs from the other air makeup units in that its gas flame heats a heat exchange plenum, providing indirect heat. The air makeup units are used for wintertime building heat and to replenish air removed from the buildings during combustion in the Drying Ranges.

The four cloth dryers designated Dryers #1 - #4 are batch loaded industrial capacity direct-contact clothes dryers, each firing natural gas with a heat input of 2.9 MMBtu/hr. The dryers are used to dry blankets that have just been dyed. Eighty-mesh lint screens control particulate emissions from the dryers. Lint collects on the screen as the drying cycle progresses, forming a highly efficient filter medium. The cloth dryers have not previously been licensed.

BPT for the Drying Ranges and Air Makeup Units R1, R2 and R3 is the following:

1. The firing of natural gas.

2. PM emission limits for the Drying Ranges based on particulate matter collected during normal operation of the units. PM emission limits for Air Makeup Units R1, R2 and R3 regulated by MEDEP Chapter 103 for fossil fuel fired units greater than 3 MMBtu/hr. PM_{10} limits are derived from the PM calculations.
3. SO_2, NOx, CO and VOC emission limits based upon AP-42 data dated 7/98 for natural gas fired units.
4. The use of fume eliminators to control emissions from the drying ranges.
5. Visible emissions from Drying Ranges #1 - #4 shall not exceed 20% opacity on a 6-minute block average basis, except for one 6-minute block average in any one-hour period.
6. Visible emissions from Air Makeup Units R1, R2 and R3 shall not exceed 10% opacity on a 6-minute block average basis.

BACT for Air Makeup Unit R4 and Dryers #1 - #4 is the following:

1. The firing of natural gas.
2. PM emission limits for Dryers #1 - #4 based on particulate matter collected during normal operation of the units. PM Emission limits for Air Makeup Unit R4 regulated by MEDEP Chapter 103 for fossil fuel fired units greater than 3 MMBtu/hr. PM_{10} limits are derived from the PM calculations.
3. SO_2, NOx, CO and VOC emission limits are based upon AP-42 data dated 7/98 for natural gas fired units.
4. Use of eighty-mesh lint screens to control PM emissions from the dryers.
5. Visible emissions from Air Makeup Unit R4 shall not exceed 10% opacity on a 6-minute block average basis.
6. Visible emissions from the dryers shall not exceed 20% opacity on a 6-minute block average basis, except for one 6-minute block average in any one-hour period.

D. VOC and HAP Emitting Processes

Flame Lamination

The nature and quantity of emissions from the flame lamination process are not known completely, other than the combustion emissions. The MSDS for the polyurethane foam used at WPS states that carbon monoxide, oxides of nitrogen, traces of isocyanates and hydrogen cyanide may occur during foam combustion. It is clear that particulate matter is emitted from this process because of the residue collected by the baghouse. This particulate matter results from partial decomposition of the foam to the solid materials from which it was derived. Tests performed by Burnett and Company, Foam Division, on polyurethane foam at much higher temperatures than those at which WPS operates for their flame lamination process yielded the following emissions:

0.1 ppm	Toluene Diisocyanate
0.021 ppm	Carbon Monoxide (CO)
0.006 ppm	Hydrogen Cyanide (HCN)
1 lb/hr	Particulate Matter (PM)

(based on 10,000 yards of 65" width)

While it is impossible to develop a mass emission rate from these results, they do indicate that HAP emissions released by this process are small enough for process HAP emissions from the flame lamination process to be considered insignificant. Insignificance of the process HAP emissions is further justified by considering that lamination of the type foam used by WPS reduces the emissions shown above (representing a similar type foam) by approximately 40%. The flame lamination process at WPS is controlled with three pulse-jet baghouses. The specially manufactured bags are pre-coated with lime, which prevents the bags from blinding and also helps to neutralize and control potential toluene diisocyanate and hydrogen cyanide emitted from the process.

A National Emission Standard for Hazardous Air Pollutants (NESHAP) for foam fabrication/lamination operations has been proposed but is not yet finalized. As proposed this standard is intended for flame lamination processes involving flame retardant foams which cause emissions of hydrogen chloride gas. The foam used by WPS is not of this type, and will therefore not be subject to the proposed NESHAP when it is promulgated.

Flocking Process

In the flock application process, acrylic adhesive is mixed with additives and pigment. Each of these materials has a VOC component, determined from MSDS. The acrylic adhesive also contains formaldehyde and acrylamide that are emitted at levels that exceed the insignificance levels presented in MEDEP Chapter 115 Appendix B.

Miscellaneous Processes

Some dyes and the pH leveling agent used in the process to create dark colored Vellux material contain a percentage VOC, determined from MSDS. Some printing is done in the stock room at WPS; cleaners and adhesive used in this area contain VOC.

Facility Process VOC and HAP Emissions

Process VOC emissions shall not exceed 39.8 tons per 12-month rolling total. HAP emissions shall not exceed 9.9 tons of any single HAP or 20.0 tons of total combined HAPs per 12-month rolling total. WPS shall keep records on a monthly and 12-month rolling basis to detail the amount of VOC or HAP containing material used, the percent VOC and/or percent HAP of the material, and the

amount of VOC or HAP emitted. WPS shall also report HAPs to the Department in accordance with ME DEP Chapter 137.

E. Facility Emissions

WPS shall not exceed 428,600,000 scf of natural gas in a 12-month rolling period. The following emissions shall not be exceeded on a 12-month rolling total:

Total Allowable Annual Emission for the Facility
(used to calculate the annual license fee)

Pollutant	**Fuel Burning Emissions**	**Process Emissions**	**Tons/year**
PM	26.5	53.6	80.1
PM_{10}	26.5	53.6	80.1
SO_2	0.1	--	0.1
NOx	30.0	--	30.0
CO	18.0	--	18.0
VOC	0.1	39.8	39.9
HAP - single	--	9.9	9.9
HAP - total	--	20.0	20.0

Annual PM emissions are calculated assuming maximum operation of the Drying Ranges and the Dryers, with the remainder of the fuel being fired in the Air Makeup Units. Annual PM_{10} emissions are based on the PM calculation.

Annual emissions of SO_2, NOx, CO and VOC are calculated based on firing the maximum allowed amount of fuel in all units.

III. AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. WPS submitted a modeling analysis with their last renewal license. Since this renewal does not include the licensing of increased emissions or the installation of new or modified equipment, WPS is not required to submit further modeling.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,

- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-79-71-L-A/R subject to the following conditions:

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (Title 38 MRSA §347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115.

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both.

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request.

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353.

(6) The license does not convey any property rights of any sort, or any exclusive privilege.

(7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions.

(8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request.

(9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license.

(10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license.

(11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

(i) perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:

(a) within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or

(b) pursuant to any other requirement of this license to perform stack testing.

(ii) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

(iii) submit a written report to the Department within thirty (30) days from date of test completion.

(12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:

(i) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

(ii) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

(iii) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

(13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.

(14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation.

(15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

SPECIFIC CONDITIONS

(16) Boiler #1

(i) Boiler #1 shall fire natural gas.

(ii) Emissions from the boiler shall not exceed the following limits:

Boiler #1 Emission Limits

	lb/MMBtu	lb/hour
PM	0.05	5.5
PM_{10}	0.05	5.5
SO_2	--	0.07
NOx	--	15.0
CO	--	9.0
VOC	--	0.6

Compliance shall be demonstrated by request of the Department through stack testing in accordance with the appropriate method found in 40 CFR Part 60, Appendix A.

(iv) Low-NOx burners shall be maintained and operated on Boiler #1. WPS shall keep descriptive, dated records of maintenance, routine or otherwise, performed on the low-NOx burners.

(v) Visible emissions from the boiler's stack (stack 1) shall not exceed 10% opacity on a 6-minute block average, except for no more than 2 six-minute block averages in a 3-hour period.

(17) Drying Ranges, Air Makeup Units and Dryers

(i) Drying Ranges #1 - #4, Air Makeup Units R1 – R4 and Dryers #1 - #4 shall fire natural gas.

(ii) Emissions from the Drying Ranges shall not exceed the following limits:

Drying Range Emission Limits

	Drying Range #1 (lb/hr)	Drying Range #2 (lb/hr)	Drying Range #3 (lb/hr)	Drying Range #4 (lb/hr)
PM	3.56	3.89	3.22	3.56
PM_{10}	3.56	3.89	3.22	3.56
SO_2	0.01	0.01	0.01	0.01
NOx	0.90	1.20	0.60	0.90
CO	0.72	0.95	0.50	0.72
VOC	0.05	0.07	0.04	0.05

Compliance shall be demonstrated by request of the Department through stack testing in accordance with the appropriate method found in 40 CFR Part 60, Appendix A.

(iii) WPS shall continue to maintain and operate fume eliminators consisting of wet scrubbers followed by filters on Drying Ranges #1 - #4. WPS shall keep descriptive, dated records of maintenance, routine or otherwise, on the fume eliminators.

(iv) Visible emissions from Drying Ranges #1 - #4 shall not exceed 20% opacity on a 6-minute block average basis, except for one 6-minute block average in any one-hour period.

(v) Emissions from the Air Makeup Units shall not exceed the following limits:

Air Makeup Unit Emission Limits
(per unit)

	lb/MMBtu	lb/hour
PM	0.12	0.5
PM_{10}	0.12	0.5
SO_2	--	0.01
NOx	--	0.41
CO	--	0.35
VOC	--	0.03

Compliance shall be demonstrated by request of the Department through stack testing in accordance with the appropriate method found in 40 CFR Part 60, Appendix A.

(vi) Air Makeup Unit R4 shall not exceed 0.05 lb/MMBtu of PM.

(vii) Visible emissions from Air Makeup Units R1, R2, R3 and R4 shall not exceed 10% opacity on a 6-minute block average basis.

(viii) Dryers #1 - #4 shall not exceed the following emission limits:

Dryer Emission Limits
(per dryer)

	lb/hour
PM	0.90
PM_{10}	0.90
SO_2	0.01
NOx	0.30
CO	0.24
VOC	0.02

Compliance shall be demonstrated by request of the Department through stack testing in accordance with the appropriate method found in 40 CFR Part 60, Appendix A.

(ix) WPS shall continue to maintain and operate 80 mesh (or finer) lint screens on Dryers #1 - #4. WPS shall keep dated, descriptive records of maintenance, routine or otherwise, on the mesh lint screens.

(x) Visible emissions from the dryers shall not exceed 20% opacity on a 6-minute block average basis, except for one 6-minute block average in any one-hour period.

(18) VOC and HAP Emitting Processes

(i) Process VOC emissions shall not exceed 39.8 tons per 12-month rolling total.

(ii) HAP emissions shall not exceed 9.9 tons of any single HAP or 20.0 tons of total combined HAPs per 12-month rolling total.

(iii) WPS shall keep records detailing the amount of VOC or HAP containing material used, the percent VOC and/or percent HAP of the material (from the MSDS sheets or other approved method), and the amount of VOC or HAP emitted.

(19) Facility Wide Emissions

WPS shall not exceed 428,600,000 scf of natural gas on a 12-month rolling total basis, to be fired in the boiler, the drying ranges, the air makeup units and the dryers. Compliance shall be demonstrated through fuel receipts.

(20) WPS shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (Title 38 MRSA §605).

(21) Chapter 137 Reporting Requirements

(i) Annual Emission Statement

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department by September 1, the information necessary to accurately update the State's emission inventory by means of:

(a) A computer program and accompanying instructions supplied by the Department; or

(b) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017
Phone: (207) 287-2437

(ii) Toxic Air Pollutants Emission Statement

In accordance with MEDEP Chapter 137, the licensee shall report, no later than September 1, every two years (1996,1998, etc.) or in a timeframe designated by the Department, the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a

written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions on the Air Toxics emissions inventory portion should be directed to:

Attn: Toxics Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017
Phone: (207) 287-2437

(22) WPS shall pay the annual air emission license fee within 30 days of December 31 of each year. Pursuant to Title 38 MRSA §353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under Title 38 MRSA §341-D, subsection 3.

(23) The term of this Order shall be for five (5) years from the signature below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2003.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: July 15, 2002
Date of application acceptance: August 2, 2002

Date filed with the Board of Environmental Protection: _____

This Order prepared by Rachel E. Pilling, Bureau of Air Quality